

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ELI SAVIT, PROSECUTING
ATTORNEY FOR WASHTENAW
COUNTY ex rel., the People of the
State of Michigan, and CITY OF
YPSILANTI,

Plaintiffs,

v.

VALLEYTREE PARTNERS LLC, VTP A1
LP, VTP ARBOR GP LLC, VTP ARBOR JV
LP, VTP ARBOR ONE LLC, VTP RIVER
WOODS, LLC, SAMUEL ROSENTHAL,
YAAKOV NUSBAUM and AMY VUJNOV,

Defendants,

Case No. 2:25-cv-10783

Hon. Matthew F. Leitman

Mag. Kimberly G. Altman

**SUPPLEMENT TO NOTICE OF
REMOVAL**

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Defendants Valleytree Partners LLC, VTP A1 LP, VTP Arbor GP LLC, VTP Arbor JV LP, VTP Arbor One LLC, VTP River Woods, LLC (“VTP Entities”), Samuel Rosenthal, Yaakov Nusbaum and Amy Vujnov (collectively “defendants”) file this supplement to defendants’ Notice of Removal (ECF No. 1, PageID.1) filed on March 20, 2025. The instant pleading supplements paragraphs nine, ten, twelve, and thirteen to defendants’ Notice of Removal to ensure clarity on diversity jurisdiction as follows:

9. Defendant VTP A1 LP is a foreign, Delaware limited partnership with its principal place of business in New Jersey. VTP A1 LP’s limited and general partners are VTP Arbor GP LLC (a Delaware limited liability company) and VTP Arbor One LLC (a Delaware limited liability company). VTP Arbor GP LLC’s sole member is VTP Arbor One LLC. The members of VTP Arbor One LLC are VTP GSG 2 LLC (a New Jersey limited liability company), GSGRFC A1 LLC (a New Jersey limited liability company), Sarah A. Kornfeld 2016 Irrevocable Gift Trust (Trustee Sarah A. Kornfeld, a citizen of California), Rachel L. Rechnitz 2016 Irrevocable Gift Trust (Trustee Rachel L. Rechnitz, a citizen of California), Etti Goldstein 2016 Irrevocable Gift Trust (Trustee Etti Goldstein, a citizen of California), Yitzchok T. Rechnitz 2016 Irrevocable Gift Trust (Trustee Yitzchok T. Rechnitz, a citizen of California), Esther M. Rechnitz 2016 Irrevocable Gift Trust

(Trustee Esther M. Rechnitz, a citizen of California), Chana T. Rechnitz 2016 Irrevocable Gift Trust (Trustee Chana T. Rechnitz, a citizen of California), Zev Goldstein (a citizen of California), and RTYS Real Estate Holdings, LLC (a California limited liability company). The members of RTYS Real Estate Holdings, LLC are Shlomo Rechnitz (a citizen of California) and Tamar Rechnitz (a citizen of California). The members of GSGRFC A1 LLC are GSGRFC LLC (a New Jersey limited liability company) and GSG Holdings LLC (a New Jersey limited liability company). The sole member of GSGRFC LLC is GSG Holdings LLC. The members of GSG Holdings LLC are Abbi Hirsch (a citizen of New Jersey) and Moshe Mendlowitz (a citizen of New Jersey). The members of VTP GSG 2 LLC (a New Jersey limited liability company) are GSG Holdings LLC (a New Jersey limited liability company), Samuel Rosenthal (a citizen of New Jersey), and Jack Nusbaum (a citizen of New Jersey).

10. Defendant VTP Arbor GP LLC is the designated general partner of defendant VTP A1 LP. Defendant VTP Arbor GP LLC is a foreign, Delaware limited liability company with its principal place of business in New Jersey. VTP Arbor GP LLC's sole member is VTP Arbor One LLC (a Delaware limited liability company). The members of VTP Arbor One LLC are VTP GSG 2 LLC (a New Jersey limited liability company), GSGRFC A1 LLC (a New Jersey limited liability company), Sarah A. Kornfeld 2016 Irrevocable Gift Trust (Trustee Sarah A. Kornfeld, a citizen

of California), Rachel L. Rechnitz 2016 Irrevocable Gift Trust (Trustee Rachel L. Rechnitz, a citizen of California), Etti Goldstein 2016 Irrevocable Gift Trust (Trustee Etti Goldstein, a citizen of California), Yitzchok T. Rechnitz 2016 Irrevocable Gift Trust (Trustee Yitzchok T. Rechnitz, a citizen of California), Esther M. Rechnitz 2016 Irrevocable Gift Trust (Trustee Esther M. Rechnitz, a citizen of California), Chana T. Rechnitz 2016 Irrevocable Gift Trust (Trustee Chana T. Rechnitz, a citizen of California), Zev Goldstein (a citizen of California), and RTYS Real Estate Holdings, LLC (a California limited liability company). The members of RTYS Real Estate Holdings, LLC are Shlomo Rechnitz (a citizen of California) and Tamar Rechnitz (a citizen of California). The members of GSGRFC A1 LLC are GSGRFC LLC (a New Jersey limited liability company) and GSG Holdings LLC (a New Jersey limited liability company). The sole member of GSGRFC LLC is GSG Holdings LLC. The members of GSG Holdings LLC are Abbi Hirsch (a citizen of New Jersey) and Moshe Mendlowitz (a citizen of New Jersey). The members of VTP GSG 2 LLC (a New Jersey limited liability company) are GSG Holdings LLC (a New Jersey limited liability company), Samuel Rosenthal (a citizen of New Jersey), and Jack Nusbaum (a citizen of New Jersey).

12. Defendant VTP Arbor One LLC is the designated limited partner of defendant VTP A1 LP. Defendant VTP Arbor One LLC is a foreign, Delaware limited liability company with its principal place of business in New Jersey. The

members of VTP Arbor One LLC are VTP GSG 2 LLC (a New Jersey limited liability company), GSGRFC A1 LLC (a New Jersey limited liability company), Sarah A. Kornfeld 2016 Irrevocable Gift Trust (Trustee Sarah A. Kornfeld, a citizen of California), Rachel L. Rechnitz 2016 Irrevocable Gift Trust (Trustee Rachel L. Rechnitz, a citizen of California), Etti Goldstein 2016 Irrevocable Gift Trust (Trustee Etti Goldstein, a citizen of California), Yitzchok T. Rechnitz 2016 Irrevocable Gift Trust (Trustee Yitzchok T. Rechnitz, a citizen of California), Esther M. Rechnitz 2016 Irrevocable Gift Trust (Trustee Esther M. Rechnitz, a citizen of California), Chana T. Rechnitz 2016 Irrevocable Gift Trust (Trustee Chana T. Rechnitz, a citizen of California), Zev Goldstein (a citizen of California), and RTYS Real Estate Holdings, LLC (a California limited liability company). The members of RTYS Real Estate Holdings, LLC are Shlomo Rechnitz (a citizen of California) and Tamar Rechnitz (a citizen of California). The members of GSGRFC A1 LLC are GSGRFC LLC (a New Jersey limited liability company) and GSG Holdings LLC (a New Jersey limited liability company). The sole member of GSGRFC LLC is GSG Holdings LLC. The members of GSG Holdings LLC are Abbi Hirsch (a citizen of New Jersey) and Moshe Mendlowitz (a citizen of New Jersey). The members of VTP GSG 2 LLC (a New Jersey limited liability company) are GSG Holdings LLC (a New Jersey limited liability company), Samuel Rosenthal (a citizen of New Jersey), and Jack Nusbaum (a citizen of New Jersey).

13. Defendant VTP River Woods LLC is a foreign, Delaware limited liability company with its principal place of business in New Jersey. The member of VTP River Woods LLC is VTP Arbor 2 LLC (a Delaware limited liability company). VTP Arbor 2 LLC's members are Valleytree Partners LLC (a New Jersey limited liability company), GSGRFC LLC (a New Jersey limited liability company), Sarah A. Kornfeld 2016 Irrevocable Gift Trust (Trustee Sarah A. Kornfeld, a citizen of California), Rachel L. Rechnitz 2016 Irrevocable Gift Trust (Trustee Rachel L. Rechnitz, a citizen of California), Etti Goldstein 2016 Irrevocable Gift Trust (Trustee Etti Goldstein, a citizen of California), Yitzchok T. Rechnitz 2016 Irrevocable Gift Trust (Trustee Yitzchok T. Rechnitz, a citizen of California), Esther M. Rechnitz 2016 Irrevocable Gift Trust (Trustee Esther M. Rechnitz, a citizen of California), Chana T. Rechnitz 2016 Irrevocable Gift Trust (Trustee Chana T. Rechnitz, a citizen of California), Zev Goldstein (a citizen of California), and RTYS Real Estate Holdings, LLC (a California limited liability company). The Members of Valleytree Partners LLC are Samuel Rosenthal (a citizen of New Jersey) and Jack Nusbaum (a citizen of New Jersey). The members of RTYS Real Estate Holdings, LLC are Shlomo Rechnitz (a citizen of California) and Tamar Rechnitz (a citizen of California). The sole member of GSGRFC LLC is GSG Holdings LLC (a New Jersey limited liability company). The members of GSG Holdings LLC are Abbi Hirsch (a citizen of New Jersey) and Moshe Mendlowitz (a citizen of New Jersey).

WHEREFORE, defendants, renew their request that the above-entitled action pending against them in the Circuit Court for the County of Washtenaw, State of Michigan, be removed to this Honorable Court.

Respectfully submitted,

BODMAN PLC

By: /s/ J. Adam Behrendt
J. Adam Behrendt (P58607)
Debani T. Gordon Lehman(P83909)
201 W. Big Beaver Road, Suite 500
Troy, MI 48084
(248) 743-6000
jbehrendt@bodmanlaw.com
dgordon@bodmanlaw.com
Attorneys for Defendants

March 31, 2025.

CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2025, I electronically served defendants' Supplement to Notice of Removal using the E- filing system which will send notification of such filing to all attorneys of record.

/s/ J. Adam Behrendt (P58607)